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WESTERN DISTRICT OF LOUISIANA
SHREVEPORT LOUISIANA
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

UNITED STATES OF AMERICA

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VERSUS

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WILLIAM EARL MADDOX

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5:20-cr-00211-01

Judge Foote

Magistrate Judge Hornsby

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS 1 & 2

Mail Fraud

18 U.S.C. § 1341

A. AT ALL TIMES RELEVANT HEREIN:

1. eBay, Inc., The World's Online Marketplace™, was an internet site where individuals could buy and sell items, typically through an auction format. To offer an item through eBay, the seller must open an eBay account by creating a user ID and providing his or her email address. eBay maintains its headquarters in California.

2. PayPal was a global e-commerce business that facilitated the transfer of money through the internet. Online money transfers served as electronic alternatives to paying with traditional paper methods, such as checks and money orders. To create and register a PayPal account, an individual need only provide a name, email address, physical address, phone number, and bank account or credit card account. Once a customer established a PayPal account, he or she could make purchases or transfers via the internet by depositing funds to his or her PayPal account from a

bank account or credit card. A customer similarly deposit funds to his or her bank account or credit card from his or her PayPal account. Opening an account with PayPal and making transfers to and from the account required the use of a computer connected to the internet. PayPal maintains its headquarters in California.

3. First Guaranty Bank ("First Guaranty") was a financial institution with banking locations within the Western District of Louisiana.

4. **William Earl Maddox** served as an elected constable in Claiborne Parish, Louisiana and resided at XXX Billy Shaw Road, Homer, Louisiana 71040 (Maddox's residence).

5. On or about September 2, 2006, the below-listed account was registered with eBay:

User Name	User Address	Email Address	eBay User ID	Company Name
William Maddox	Maddox's residence	constable@bellsouth.net	middlemarketing	Middle Marketing LLC

6. On or about January 7, 2010, the below-listed PayPal business account was opened:

User Name	Account Address	Email Address	Business Name	Account Number
William Maddox	Maddox's residence	constable@bellsouth.net	Middle Marketing	ending in 8728

7. On or around August 13, 2012, **William Earl Maddox** opened the below-listed business checking account with First Guaranty:

Account Title	Account Address	Account Number
Middle Marketing LLC	Maddox's residence	ending in 0273

B. THE SCHEME AND ARTIFICE TO DEFRAUD

1. Beginning in or around January 1, 2015, and continuing until on or about December 31, 2018, in the Western District of Louisiana and elsewhere, the defendant, **William Earl Maddox**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud others and to obtain money and property by means of false pretenses, representations, and promises, well knowing at the time the pretenses, representations and promises would be and were false when made, which scheme is further described in the following paragraphs.

2. The primary object of the scheme and artifice to defraud was to obtain payments from individuals by causing them to believe they were purchasing all-natural herbal supplements to treat impotence.

3. It was a part of the scheme and artifice to defraud that **William Earl Maddox** obtained green capsules in unlabeled blister packs from foreign countries, including China. The capsules contained sildenafil, which is the active ingredient in the prescription drug Viagra; tadalafil, which is the active ingredient in the prescription drug Cialis; and testosterone propionate, which is an anabolic steroid and a Schedule III controlled dangerous substance. The capsules were mailed to Maddox's residence.

4. It was further part of the scheme and artifice to defraud that **William Earl Maddox** had the two different types of green capsules repackaged utilizing labeling that he created or caused to be created. The labeling for both "Sex Assurance" and "Priority Male" stated that the capsules contained "100% natural herbs and root

ingredients formulated to bring you the most powerful Aphrodisiac [sic] ever.” Neither the “Sex Assurance” labeling nor the “Priority Male” labeling stated that the capsules contained sildenafil, tadalafil, or testosterone propionate.

5. It was further part of the scheme and artifice to defraud that **William Earl Maddox** caused the “Sex Assurance” and “Priority Male” capsules to be advertised for sale on eBay and on websites that he operated, including www.sexassurance.com and www.middlemarketing.com. The websites stated, among other things, “Sex Assurance helps with impotency problems.” If a customer made a purchase, payment was made to the PayPal business account for Middle Marketing.

6. It was further part of the scheme and artifice to defraud that **William Earl Maddox** shipped “Sex Assurance” and “Priority Male” capsules to customers via the United States Postal Service.

7. It was further part of the scheme and artifice to defraud that **William Earl Maddox** transferred the funds generated from the sale of the “Sex Assurance” and “Priority Male” products from the PayPal business account for Middle Marketing to the First Guaranty bank account for Middle Marketing.

C. THE MAILINGS

On or about the dates set forth below, in the Western District of Louisiana, the Defendant, **William Earl Maddox**, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to do so, did knowingly place and cause to be placed in an authorized depository for mail matter for delivery by the United States Postal Service according to the directions thereon as set forth below, an envelope

containing capsules labeled, in part, as “100% natural herbs” when in fact the capsules actually contained sildenafil, the active ingredient in the prescription drug Viagra, all in violation of Title 18, United States Code, Section 1341 and 2 [18 U.S.C. §§ 1341 & 2].

COUNT	DATE	ADDRESS
1	01/25/2018	1440 Coral Ridge Drive #370, Coral Springs, FL 33071
2	11/24/2018	4209 Lakeland Drive #372, Flowood, MS 392392

COUNTS 3 - 5

**Misbranding of a Drug with Intent to Defraud or Deceive
[21 U.S.C. §§ 331(k) and 333(a)(2)]**

A. The allegations in Paragraphs A and B of Counts 1 and 2 are realleged and incorporated by reference as though set forth in full herein.

B. On or about the dates set forth below, in the Western District of Louisiana, the defendant, **William Earl Maddox**, having received a drug and its components after shipment in interstate commerce, misbranded or caused the misbranding of the drug and then held the drug for sale, and did so with the intent to defraud or deceive, all in violation of Title 21, United States Code, Sections 331(k) and 333(a)(2). [21 U.S.C. §§ 331(k) and 333(a)(2)].

COUNT	DATE
3	01/25/2018
4	11/24/2018
5	03/13/2019

COUNTS 6-12
Wire Fraud
[18 U.S.C. § 1343]

A. The allegations of Paragraphs A and B are realleged and incorporated by reference as though set forth in full herein as the scheme to defraud.

B. On or about the dates set forth below, in the Western District of Louisiana and elsewhere, the defendant, **William Earl Maddox**, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to do so, did knowingly cause to be transmitted by means of a wire communication in interstate commerce the signs, signals, and sounds described below from PayPal business account ending in 8728 to First Guaranty Bank account ending in 0273:

Count	Date	Amount Electronically Transferred
6	02/14/2018	\$1,500.00
7	04/16/2018	\$1,000.00
8	05/02/2018	\$1,000.00
9	06/14/2018	\$1,000.00
10	07/18/2018	\$1,000.00
11	08/17/2018	\$2,000.00
12	10/01/2018	\$1,000.00

all in violation of Title 18, United States Code, Section 1343. [18 U.S.C. § 1343].

A TRUE BILL:

REDACTED

GRAND JURY FOREPERSON

ALEXANDER C. VAN HOOK
Acting United States Attorney

By: 

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